

1 Gary L. Schultz
Post Office Box 113
2 McMinnville, Oregon 97128
(503) 472-2673

3 Attorney for Debtor
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7 IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

8 In Re
9 Danielle Lee Wait,

10 Debtor.

)
) Case No. 15-33254-rld7
)

) MOTION TO CONTINUE
)
11)

12 Debtor, by and through her attorney, Gary L. Schultz, moves the court for an order
13 continuing the hearing presently set for October 28, 2015 on the Trustee's Objection to
14 Exemptions. This motion is based upon the affidavit filed herein which is by this reference
15 incorporated herein.

16 DATED: October 9, 2015.
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18

19 /s/ Gary L. Schultz
Gary L. Schultz OSB #801041
Attorney for Debtor
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21 I, Gary L. Schultz, certify that a copy of this request was sent to my client on the date
22 set forth above.
23

24 /s/ Gary L. Schultz
Gary L. Schultz
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) AFFIDAVIT IN SUPPORT
) OF MOTION TO CONTINUE
)

10
11 STATE OF OREGON) ss.
County of YAMHILL)

12 I, Gary L. Schultz, being first duly sworn, depose and say:

13 I am requesting a continuance of the hearing set in the entitled case for the following
14 reason: I will be out of the country on October 28, 2015, the date on which it is presently
15 scheduled for hearing. I will return to my office on November 10, 2015.

16 I contacted Kirk Knutson, attorney for trustee Rodolfo Camacho, and he indicated he
17 would have no objection to a reset. He also indicated that he will be out of the country from
18 November 4, 2015 through November 16, 2015.

19 DATED: October 9, 2015.
20

21 /s/ Gary L. Schultz
22 Gary L. Schultz OSB #801041
Attorney for Debtor

23 SUBSCRIBED and SWORN TO ON: October 9, 2015.
24

25 /s/ Kathleen E. Larsen
Notary Public for Oregon
My commission expires: 05/27/17
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